



The request for a stay is approved.

So ordered.

/s/ Alvin K. Hellerstein

August 23, 2022

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August 17, 2022

**VIA ECF AND FACSIMILE (212) 805-7942**

Honorable Alvin Hellerstein  
 United States District Judge  
 Daniel Patrick Moynihan United States Courthouse  
 500 Pearl St., Room 1050  
 New York, NY 10007-1312

**Re: Sabby Volatility Warrant Master Fund, Ltd. v. Pareteum Corp. et al.**  
**No. 1:19-cv-10460-AKH (S.D.N.Y.)**

Dear Judge Hellerstein:

We represent Plaintiff Sabby Volatility Warrant Master Fund, Ltd. in the above-captioned action. We are writing to advise the court that the plaintiff and the individual defendants have reached an agreement to resolve the action, and to request an immediate stay of further proceedings, as detailed below. Counsel for the Defendants Robert H. Turner, Edward O'Donnell, Denis McCarthy, Victor Bozzo, Robert Lippert, Yves Van Sante, and Luis Jimenez-Tuñon ("Individual Defendants") joins in this request.

The settlement will become effective, and the parties will file a stipulation of discontinuance pursuant to Rule 41(a)(1)(A)(ii), upon final approval of the settlement in a related action pending before your honor, *In re Pareteum Securities Litigation*, No. 1:19-cv-09767-AKH-GWG (the "Class Action"), and the dismissal of another related action, *Loskot v. Pareteum Corp.*, No. 20-CIV-02279 (Cal. Super. Ct., San Mateo Cty.). As your honor is aware, the parties in the Class Action have agreed to resolve that action and, subject to the Court's approval, the Class Action plaintiffs intend to file a motion for preliminary approval of that settlement no later than September 7, 2022. *See* ECF Doc. No. 258 (Aug. 17, 2022). The Class Action parties have requested that the Court stay other further proceedings in the Class Action. *See id.*

We respectfully request that the Court stay further proceedings in the instant action until resolution of the Class Action plaintiff's motion for final approval of class action settlement in the Class Action.

Respectfully submitted,

/s/ Barry R. Lax  
 Barry R. Lax, Esq.

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